

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

South African Bunkering and Trading Ltd.,	§	
	§	
Plaintiff,	§	
	§	CIVIL ACTION 21-cv-866-LPS
vs.	§	
	§	IN ADMIRALTY, Rule 9(h)
Labpro Pharma LLC, et al.,	§	
	§	
Defendants and Garnishees.	§	

**SOUTH AFRICAN BUNKERING AND TRADING, LTD. MOTION TO STRIKE
“VERIFIED ANSWER” [ECF 23] SIGNED BY NON-ATTORNEY**

“It has been the law for the better part of two centuries, for example, that a corporation may appear in the federal courts only through licensed counsel.” *Rowland v. California Men's Colony, Unit II Men's Advisory Council*, 506 U.S. 194, 201–02 (1993); *accord, Palazzo v. Gulf Oil Corp.*, 764 F.2d 1381, 1385 (11th Cir. 1985); *Simbraw, Inc. v. United States*, 367 F.2d 373, 374 (3d Cir.1966); *Katz v. Feldman*, No. CV 18-213 (MN), 2019 WL 1320283, at *2 (D. Del. Mar. 22, 2019)(“Feldman is not an attorney and may not represent the interests of Salem Botanicals, Inc. Salem Botanicals, Inc. must be represented by counsel.”); *Transportes Aereos de Angola v. Ronair, Inc.*, 104 F.R.D. 482, 505 (D. Del. 1985).

This Court accordingly now should strike Defendants’ “Verified Answer” [ECF 23] signed only by Defendants’ representative Dr. Moise Arrah, a non-attorney (and so also not a member of this Court’s Bar).¹

YOUNG CONAWAY STARGATT & TAYLOR LLP

/s/ Timothy Jay Houseal
Timothy Jay Houseal (Del. Bar ID No. 2880)
Rodney Square

¹ The purported “Verification” is further invalid because it lists the Affiant as “Zeke Matthew Rodela,” who appears to be the Notary rather than the Affiant.

1000 North King Street
Wilmington, DE 19801
(302) 571-6682
thouseal@ycst.com

Attorneys for South African Bunkering and Trading Ltd.

ADMITTED PRO HAC VICE

J. Stephen Simms
Simms Showers LLP
201 International Circle, Ste. 230
Baltimore, Maryland 21030
Telephone: (410) 783-5795
Facsimile: (410) 510-1789
jssimms@simmsshowers.com

Dated: July 20, 2021

CERTIFICATE OF SERVICE

J. Stephen Simms, admitted *pro hac vice counsel* for Plaintiff South African Bunkering and Trading Ltd. (“SABT”) hereby certifies that, on July 20, 2021, I caused a true and correct copy of the foregoing Motion to Strike to be served by prepaid, First Class, United States Mail on the Registered Agent of each defendant, as well as alternatively served by prepaid First Class, United States Mail on the Texas Secretary of State, as follows:

MSBE Ventures, Inc.
c/o Moise O. Arrah, RA
12345 Jones Road
Ste 260
Houston, TX 77070

Labpro Pharma LLC
c/o Moise O. Arrah, RA
24327 Palo Dura Drive
Hockley, TX 77447

Service of Process
Secretary of State
P.O. Box 12079
Austin, Texas 78711-
2079

Further on July 20, 2021, I emailed electronic copy of Plaintiff’s Motion to Moise O. Arrah, R.A. for both Defendants (to: moise@labpropharma.com)

/s/ J. Stephen Simms